



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DR/EL
F. #2023R00982

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 15, 2025

By ECF

The Honorable Allyne R. Ross
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Eliahou Paldiel et al.
Criminal Docket No. 24-329 (ARR)

Dear Judge Ross:

The government respectfully submits this letter requesting the Court adjourn the status conference scheduled for July 23, 2025 and the motion schedule ordered on June 13, 2025. The parties are actively involved in complex plea negotiations which may resolve this matter in advance of trial and avoid the need for additional briefing regarding Kousisis v. United States, No. 23-909, 2025 WL 1459593, at *3 (U.S. May 22, 2025). To allow the parties to continue to engage in plea negotiations, the government, with the consent of the defendants, requests the Court adjourn the current status conference and motion schedule by six weeks, and adopt the following motion schedule:

Government Briefing Deadline: September 11, 2025

Defense Response Deadline: September 25, 2025

Government Reply Deadline: October 2, 2025

Finally, to allow the parties to continue to engage in plea negotiations, the government, with the consent of the defendants, requests the Court to exclude time under the Speedy Trial Act until the next status conference, which will allow time for the parties to continue to review discovery and engage in plea negotiations. See 18 U.S.C. § 3161(h)(7)(B).

Respectfully submitted,

JOSEPH NOCELLA, JR.
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cc: Clerk of Court (ARR) (by ECF)
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